

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

CA #: 04CV12058WGY

BETTE J. RIVARD, as Administratrix of)
the Estate of John A Horton,)
Plaintiff)
v.)
DARTMOUTH HOUSE OF CORRECTION,)
BRISTOL COUNTY, JOHN DOE,)
RICHARD ROE, Bristol County Corrections)
employees the identity and number of whom is)
presently unknown to the Plaintiff,)
Defendants/)
Third Party Plaintiffs)
v.)
PRISON HEALTH SERVICES, INC. and)
CORRECTIONAL HEALTH CARE)
SOLUTIONS, INC.)
Third Party Defendants)

DEFENDANT PRISON HEALTH SERVICES, INC.'S
CERTIFICATION PURSUANT TO RULE 16.1(D)(3)

Pursuant to this Court's Notice of Scheduling Conference, counsel for Defendant Prison Health Services, Inc., hereby certifies that she conferred with her client regarding the following:

- a. With a view to establishing a budget for the costs of conducting the full course – and various – alternative courses of the litigation;
- b. To consider the resolution of the litigation through the use of alternative resolution programs such as those outlined in Local Rule 16.4.


Respectfully submitted,

The Defendant,
Prison Health Services, Inc.

By its attorneys,

KOUFMAN AND FREDERICK, LLP

Date: December 27, 2004


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